

EXHIBIT A

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KEITH MARTIN					
DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/3/2019	All Def Affirm	21	1	21	2
4/3/2019	All Def Affirm	22	25	22	25
4/3/2019	All Def Affirm	23	1	23	4
4/3/2019	All Def Affirm	23	8	23	8
4/3/2019	All Def Affirm	26	10	27	8
4/3/2019	All Def Affirm	27	10	27	15
4/3/2019	All Def Affirm	31	12	31	19
4/3/2019	All Def Affirm	31	23	32	9
4/3/2019	All Def Affirm	33	9	33	13
4/3/2019	All Def Affirm	35	15	35	20
4/3/2019	All Def Affirm	35	24	36	2
4/3/2019	All Def Affirm	36	6	36	19
4/3/2019	All Def Affirm	37	1	37	9
4/3/2019	All Def Affirm	37	11	37	11
4/3/2019	All Def Affirm	38	3	38	6
4/3/2019	All Def Affirm	38	9	38	13
4/3/2019	All Def Affirm	41	6	41	17
4/3/2019	All Def Affirm	41	24	41	25
4/3/2019	All Def Affirm	43	24	44	1
4/3/2019	All Def Affirm	44	6	44	10
4/3/2019	All Def Affirm	44	13	44	13
4/3/2019	All Def Affirm	44	14	44	25
4/3/2019	All Def Affirm	45	1	45	2
4/3/2019	All Def Affirm	45	3	45	5
4/3/2019	All Def Affirm	45	6	45	12
4/3/2019	All Def Affirm	46	7	46	11
4/3/2019	All Def Affirm	46	14	46	14
4/3/2019	All Def Affirm	46	15	46	17
4/3/2019	All Def Affirm	46	18	46	23
4/3/2019	All Def Affirm	46	18	46	23
4/3/2019	All Def Affirm	46	18	46	23
4/3/2019	All Def Affirm	47	15	47	17
4/3/2019	All Def Affirm	49	24	50	2
4/3/2019	All Def Affirm	52	15	52	22
4/3/2019	All Def Affirm	54	3	54	4
4/3/2019	All Def Affirm	54	16	54	21
4/3/2019	All Def Affirm	54	24	55	17
4/3/2019	All Def Affirm	55	21	56	1
4/3/2019	All Def Affirm	58	7	58	21
4/3/2019	All Def Affirm	59	4	59	4
4/3/2019	All Def Affirm	59	5	59	12
4/3/2019	All Def Affirm	59	13	59	19
4/3/2019	All Def Affirm	60	2	60	8
4/3/2019	All Def Affirm	60	10	60	13
4/3/2019	All Def Affirm	60	16	60	19
4/3/2019	All Def Affirm	61	6	61	14

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KEITH MARTIN					
DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/3/2019	All Def Affirm	61	17	61	17
4/3/2019	All Def Affirm	61	18	61	23
4/3/2019	All Def Affirm	62	8	62	14
4/3/2019	All Def Affirm	62	15	62	22
4/3/2019	All Def Affirm	63	1	63	17
4/3/2019	All Def Affirm	64	18	65	6
4/3/2019	All Def Affirm	65	15	65	19
4/3/2019	All Def Affirm	65	22	66	2
4/3/2019	All Def Affirm	66	3	66	5
4/3/2019	All Def Affirm	66	9	66	25
4/3/2019	All Def Affirm	67	2	67	17
4/3/2019	All Def Affirm	67	21	68	7
4/3/2019	All Def Affirm	68	9	68	15
4/3/2019	All Def Affirm	68	17	68	21
4/3/2019	All Def Affirm	69	6	69	8
4/3/2019	All Def Affirm	69	16	69	17
4/3/2019	All Def Affirm	69	19	69	23
4/3/2019	All Def Affirm	76	4	76	14
4/3/2019	All Def Affirm	76	20	77	9
4/3/2019	All Def Affirm	77	10	77	22
4/3/2019	All Def Affirm	77	23	78	5
4/3/2019	All Def Affirm	78	7	78	7
4/3/2019	All Def Affirm	78	10	78	11
4/3/2019	All Def Affirm	81	21	81	24
4/3/2019	All Def Affirm	81	25	82	5
4/3/2019	All Def Affirm	82	7	82	13
4/3/2019	All Def Affirm	82	18	82	22
4/3/2019	All Def Affirm	82	25	83	5
4/3/2019	All Def Affirm	83	8	83	12
4/3/2019	All Def Affirm	83	14	83	23
4/3/2019	All Def Affirm	84	1	84	1
4/3/2019	All Def Affirm	84	15	84	20
4/3/2019	All Def Affirm	84	23	84	25
4/3/2019	All Def Affirm	85	10	85	14
4/3/2019	All Def Affirm	85	17	85	19
4/3/2019	All Def Affirm	85	20	85	23
4/3/2019	All Def Affirm	86	1	86	7
4/3/2019	All Def Affirm	89	9	89	16
4/3/2019	All Def Affirm	89	17	89	18
4/3/2019	All Def Affirm	89	20	89	20
4/3/2019	All Def Affirm	90	4	90	21
4/3/2019	All Def Affirm	91	15	91	25
4/3/2019	All Def Affirm	92	13	92	16
4/3/2019	All Def Affirm	92	18	93	2
4/3/2019	All Def Affirm	93	11	93	14
4/3/2019	All Def Affirm	95	14	95	16

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KEITH MARTIN					
DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/3/2019	All Def Affirm	96	1	96	5
4/3/2019	All Def Affirm	96	9	96	12
4/3/2019	All Def Affirm	96	17	96	21
4/3/2019	All Def Affirm	96	25	97	3
4/3/2019	All Def Affirm	97	7	97	24
4/3/2019	All Def Affirm	98	8	98	13
4/3/2019	All Def Affirm	98	16	99	1
4/3/2019	All Def Affirm	99	3	99	24
4/3/2019	All Def Affirm	100	4	100	8
4/3/2019	All Def Affirm	100	13	100	24
4/3/2019	All Def Affirm	101	1	101	1
4/3/2019	All Def Affirm	102	8	102	12
4/3/2019	All Def Affirm	102	19	102	19
4/3/2019	All Def Affirm	103	20	103	23
4/3/2019	All Def Affirm	104	2	104	5
4/3/2019	All Def Affirm	104	10	104	10
4/3/2019	All Def Affirm	104	19	104	21
4/3/2019	All Def Affirm	105	3	105	4
4/3/2019	All Def Affirm	105	13	105	18
4/3/2019	All Def Affirm	106	3	106	8
4/3/2019	All Def Affirm	106	11	106	13
4/3/2019	All Def Affirm	109	9	110	8
4/3/2019	All Def Affirm	111	12	111	21
4/3/2019	All Def Affirm	111	23	111	25
4/3/2019	All Def Affirm	113	22	114	2
4/3/2019	All Def Affirm	114	4	114	9
4/3/2019	All Def Affirm	120	18	120	20
4/3/2019	All Def Affirm	121	6	121	6
4/3/2019	All Def Affirm	131	17	131	25
4/3/2019	All Def Affirm	132	1	132	2
4/3/2019	All Def Affirm	132	9	132	10
4/3/2019	All Def Affirm	132	11	132	22
4/3/2019	All Def Affirm	132	24	133	15
4/3/2019	All Def Affirm	133	17	133	21
4/3/2019	All Def Affirm	133	24	133	24
4/3/2019	All Def Affirm	134	9	134	12
4/3/2019	All Def Affirm	134	22	134	23
4/3/2019	All Def Affirm	138	2	138	5
4/3/2019	All Def Affirm	138	10	138	15
4/3/2019	All Def Affirm	138	17	138	19
4/3/2019	All Def Affirm	138	20	138	24
4/3/2019	All Def Affirm	139	2	139	3
4/3/2019	All Def Affirm	141	4	141	7
4/3/2019	All Def Affirm	141	12	141	15
4/3/2019	All Def Affirm	141	24	142	2
4/3/2019	All Def Affirm	142	5	142	5

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KEITH MARTIN					
DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/3/2019	All Def Affirm	142	10	142	13
4/3/2019	All Def Affirm	142	18	142	20
4/3/2019	All Def Affirm	142	23	143	3
4/3/2019	All Def Affirm	143	4	143	6
4/3/2019	All Def Affirm	143	10	143	14
4/3/2019	All Def Affirm	143	18	143	18
4/3/2019	All Def Affirm	146	7	146	16
4/3/2019	All Def Affirm	146	23	147	9
4/3/2019	All Def Affirm	147	11	147	21
4/3/2019	All Def Affirm	147	24	148	13
4/3/2019	All Def Affirm	148	15	148	15
4/3/2019	All Def Affirm	150	12	150	17
4/3/2019	All Def Affirm	150	20	150	20
4/3/2019	All Def Affirm	160	17	160	22
4/3/2019	All Def Affirm	160	25	160	25
4/3/2019	All Def Affirm	161	1	161	11
4/3/2019	All Def Affirm	161	14	161	18
4/3/2019	All Def Affirm	161	20	162	6
4/3/2019	All Def Affirm	162	11	163	7
4/3/2019	All Def Affirm	163	8	163	15
4/3/2019	All Def Affirm	163	16	163	18
4/3/2019	All Def Affirm	163	24	164	7
4/3/2019	All Def Affirm	164	20	164	24
4/3/2019	All Def Affirm	168	21	169	5
4/3/2019	All Def Affirm	169	8	169	13
4/3/2019	All Def Affirm	169	16	169	19
4/3/2019	All Def Affirm	170	5	170	5
4/3/2019	All Def Affirm	170	19	171	3
4/3/2019	All Def Affirm	171	14	171	16
4/3/2019	All Def Affirm	172	5	172	9
4/3/2019	All Def Affirm	172	13	172	17
4/3/2019	All Def Affirm	172	20	172	20
4/3/2019	All Def Affirm	172	21	173	2
4/3/2019	All Def Affirm	178	23	179	6
4/3/2019	All Def Affirm	179	13	180	1
4/3/2019	All Def Affirm	180	5	180	7
4/3/2019	All Def Affirm	181	13	181	18
4/3/2019	All Def Affirm	181	24	181	25
4/3/2019	All Def Affirm	182	1	182	9
4/3/2019	All Def Affirm	182	23	183	2
4/3/2019	All Def Affirm	183	4	183	4
4/3/2019	All Def Affirm	184	6	184	23
4/3/2019	All Def Affirm	185	23	185	24
4/3/2019	All Def Affirm	186	1	186	2
4/3/2019	All Def Affirm	186	10	186	13
4/3/2019	All Def Affirm	186	18	186	19

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KEITH MARTIN					
DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/3/2019	All Def Affirm	188	2	188	11
4/3/2019	All Def Affirm	190	9	190	11
4/3/2019	All Def Affirm	190	12	190	21
4/3/2019	All Def Affirm	191	1	191	4
4/3/2019	All Def Affirm	191	7	191	7
4/3/2019	All Def Affirm	191	8	191	11
4/3/2019	All Def Affirm	191	12	191	14
4/3/2019	All Def Affirm	191	20	192	10
4/3/2019	All Def Affirm	192	14	192	19
4/3/2019	All Def Affirm	192	22	192	22
4/3/2019	All Def Affirm	192	23	192	25
4/3/2019	All Def Affirm	193	1	193	2
4/3/2019	All Def Affirm	193	7	193	14
4/3/2019	All Def Affirm	193	16	193	21
4/3/2019	All Def Affirm	193	25	194	5
4/3/2019	All Def Affirm	194	15	194	17
4/3/2019	All Def Affirm	196	10	196	14
4/3/2019	All Def Affirm	196	18	196	19
4/3/2019	All Def Affirm	197	16	197	19
4/3/2019	All Def Affirm	197	20	197	21
4/3/2019	All Def Affirm	197	23	197	23
4/3/2019	All Def Affirm	197	24	197	25
4/3/2019	All Def Affirm	198	2	198	4
4/3/2019	All Def Affirm	198	7	198	7
4/3/2019	All Def Affirm	204	22	204	23
4/3/2019	All Def Affirm	205	5	205	7
4/3/2019	All Def Affirm	205	15	205	18
4/3/2019	All Def Affirm	205	22	205	22
4/3/2019	All Def Affirm	207	3	207	5
4/3/2019	All Def Affirm	207	8	207	8
4/3/2019	All Def Affirm	208	8	208	17
4/3/2019	All Def Affirm	208	25	209	3
4/3/2019	All Def Affirm	209	7	209	7
4/3/2019	All Def Affirm	210	2	210	3
4/3/2019	All Def Affirm	210	6	210	14
4/3/2019	All Def Affirm	210	20	210	23
4/3/2019	All Def Affirm	211	1	211	5
4/3/2019	All Def Affirm	211	9	211	14
4/3/2019	All Def Affirm	211	16	211	25
4/3/2019	All Def Affirm	212	5	212	19
4/3/2019	All Def Affirm	212	23	213	4
4/3/2019	All Def Affirm	213	6	213	8
4/3/2019	All Def Affirm	213	18	213	24
4/3/2019	All Def Affirm	214	3	214	9
4/3/2019	All Def Affirm	214	12	214	13
4/3/2019	All Def Affirm	214	18	214	19

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KEITH MARTIN					
DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/3/2019	All Def Affirm	215	11	215	19
4/3/2019	All Def Affirm	215	22	215	22
4/3/2019	All Def Affirm	216	2	216	9
4/3/2019	All Def Affirm	216	11	216	24
4/3/2019	All Def Affirm	217	10	217	19
4/3/2019	All Def Affirm	218	2	218	5
4/3/2019	All Def Affirm	218	11	218	18
4/3/2019	All Def Affirm	218	20	218	25
4/3/2019	All Def Affirm	219	3	219	7
4/3/2019	All Def Affirm	219	13	219	13
4/3/2019	All Def Affirm	220	18	220	20
4/3/2019	All Def Affirm	221	1	221	3
4/3/2019	All Def Affirm	221	9	221	11
4/3/2019	All Def Affirm	221	14	221	16
4/3/2019	All Def Affirm	221	23	221	25
4/3/2019	All Def Affirm	222	5	222	7
4/3/2019	All Def Affirm	222	12	222	15
4/3/2019	All Def Affirm	222	21	222	24
4/3/2019	All Def Affirm	223	7	223	15
4/3/2019	All Def Affirm	223	21	223	23
4/3/2019	All Def Affirm	223	25	224	12
4/3/2019	All Def Affirm	224	16	224	24
4/3/2019	All Def Affirm	225	4	225	7
4/3/2019	All Def Affirm	225	12	225	12
4/3/2019	All Def Affirm	225	21	226	12
4/3/2019	All Def Affirm	227	3	227	15
4/3/2019	All Def Affirm	227	16	227	18
4/3/2019	All Def Affirm	227	25	228	5
4/3/2019	All Def Affirm	228	8	228	11
4/3/2019	All Def Affirm	228	21	229	11
4/3/2019	All Def Affirm	230	6	230	11
4/3/2019	All Def Affirm	230	12	230	13
4/3/2019	All Def Affirm	230	21	230	25
4/3/2019	All Def Affirm	231	21	232	16
4/3/2019	All Def Affirm	233	20	234	15
4/3/2019	All Def Affirm	235	3	235	5
4/3/2019	All Def Affirm	235	8	235	10
4/3/2019	All Def Affirm	235	14	235	23
4/3/2019	All Def Affirm	236	10	236	15
4/3/2019	All Def Affirm	236	25	236	25
4/3/2019	All Def Affirm	237	17	237	19
4/3/2019	All Def Affirm	238	2	238	5
4/3/2019	Endo Affirm	240	14	240	18
4/3/2019	All Def Affirm	243	6	243	14
4/3/2019	All Def Affirm	243	22	244	8
4/3/2019	All Def Affirm	245	4	245	8

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KEITH MARTIN					
DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/3/2019	All Def Affirm	245	13	245	15
4/3/2019	All Def Affirm	246	11	246	14
4/3/2019	All Def Affirm	246	18	246	25
4/3/2019	All Def Affirm	247	7	247	12
4/3/2019	All Def Affirm	247	15	248	16
4/3/2019	All Def Affirm	248	19	248	24
4/3/2019	All Def Affirm	249	1	249	17
4/3/2019	All Def Affirm	249	19	249	22
4/3/2019	All Def Affirm	249	24	250	12
4/3/2019	All Def Affirm	251	2	251	3
4/3/2019	All Def Affirm	251	5	251	13
4/3/2019	All Def Affirm	252	6	252	8
4/3/2019	All Def Affirm	252	17	252	18
4/3/2019	All Def Affirm	256	18	257	21
4/3/2019	Janssen Affirm	290	11	290	25
4/3/2019	Endo Affirm	290	11	290	25
4/3/2019	All Def Affirm	290	11	291	4
4/3/2019	Janssen Affirm	291	1	291	4
4/3/2019	Endo Affirm	291	1	291	4
4/3/2019	All Def Affirm	291	19	291	22
4/3/2019	All Def Affirm	291	24	291	25
4/3/2019	All Def Affirm	304	21	305	7
4/3/2019	All Def Affirm	305	8	305	14
4/3/2019	All Def Affirm	305	16	305	17
4/3/2019	All Def Affirm	306	14	306	25
4/3/2019	All Def Affirm	307	22	308	1
4/3/2019	All Def Affirm	308	2	308	12
4/3/2019	All Def Affirm	308	16	308	16
4/3/2019	All Def Affirm	312	18	313	5
4/3/2019	All Def Affirm	313	9	313	9
4/3/2019	All Def Affirm	315	22	316	4
4/3/2019	All Def Affirm	320	8	322	1
4/3/2019	All Def Affirm	323	10	324	21
4/3/2019	All Def Affirm	325	6	325	10
4/3/2019	All Def Affirm	326	2	326	9
4/3/2019	All Def Affirm	326	11	326	15
4/3/2019	All Def Affirm	329	5	329	24
4/3/2019	All Def Affirm	330	18	330	22
4/3/2019	All Def Affirm	331	5	331	6
4/3/2019	All Def Affirm	332	21	333	20
4/3/2019	All Def Affirm	333	22	334	10
4/3/2019	All Def Affirm	334	18	334	22
4/3/2019	All Def Affirm	334	25	335	7
4/3/2019	All Def Affirm	335	10	335	13
4/3/2019	All Def Affirm	335	15	335	15
4/3/2019	All Def Affirm	335	16	336	3

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KEITH MARTIN					
DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS			
		Begin Page at	Begin Line at	End Page at	End Line at
4/3/2019	All Def Affirm	336	5	336	10
4/3/2019	All Def Affirm	336	13	336	13

PLAINTIFFS' OBJECTIONS TO KEITH MARTIN DEPOSITION DESIGNATIONS				
Begin Page at	Begin Line at	End Page at	End Line at	Objection
65	22	66	2	FRE 403; Speculation; Lack of Foundation
82	20	82	22	Objection to Form
83	3	83	5	Objection to Form
85	10	85	14	FRE 403; Vague; Misleading; Argumentative
85	17	85	19	FRE 403; Vague; Misleading; Argumentative
85	20	85	23	FRE 403; Vague; Misleading; Argumentative
86	1	86	3	FRE 403; Vague; Misleading; Argumentative
95	14	95	16	FRE 403; Speculation; Lack of Foundation
96	1	96	5	FRE 403; Speculation; Lack of Foundation
96	9	96	12	FRE 403; Speculation; Lack of Foundation
96	17	96	21	FRE 403; Speculation; Lack of Foundation
96	25	96	25	FRE 403; Speculation; Lack of Foundation
98	22	99	1	FRE 403; Not CT1 Evidence
99	3	99	13	FRE 403; Irrelevant; Not CT1 Evidence
100	20	100	24	FRE 403; Irrelevant; Not CT1 Evidence
101	1	101	1	FRE 403; Irrelevant; Not CT1 Evidence
102	8	102	12	FRE 403; Irrelevant; Not CT1 Evidence
102	19	102	19	FRE 403; Irrelevant; Not CT1 Evidence
103	20	103	23	FRE 403; Speculation; Lack of Foundation
104	2	104	5	FRE 403; Speculation; Lack of Foundation
104	10	104	10	FRE 403; Speculation; Lack of Foundation
104	19	104	21	FRE 403; Irrelevant; Not CT1 Evidence
105	3	105	4	FRE 403; Irrelevant; Not CT1 Evidence
178	23	179	6	FRE 403; Incomplete hypothetical; Not CT1 Evidence
179	13	180	1	FRE 403; Incomplete hypothetical; Not CT1 Evidence
180	5	180	7	FRE 403; Incomplete hypothetical; Not CT1 Evidence
213	1	213	4	FRE 403; Vague; Calls for legal conclusion
213	6	213	8	FRE 403; Vague; Calls for legal conclusion

PLAINTIFFS' OBJECTIONS TO KEITH MARTIN DEPOSITION DESIGNATIONS				
Begin Page at	Begin Line at	End Page at	End Line at	Objection
213	18	213	24	FRE 403; Vague; Calls for legal conclusion
214	3	214	9	FRE 403; Vague; Calls for legal conclusion
214	12	214	13	FRE 403; Vague; Calls for legal conclusion
214	18	214	19	FRE 403; Vague; Calls for legal conclusion
223	7	223	15	FRE 403; Incomplete hypothetical; Calls for legal conclusion; Lack of Foundation
223	21	223	23	FRE 403; Incomplete hypothetical; Calls for legal conclusion; Lack of Foundation
223	25	223	25	FRE 403; Incomplete hypothetical; Calls for legal conclusion; Lack of Foundation
329	19	329	24	FRE 403

DEFENDANTS' RESPONSES IN SUPPORT OF AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KEITH MARTIN

See attached response key

DEPO DATE	NOTES				
	Begin Page at	Begin Line at	End Page at	End Line at	NOTES
4/3/2019	65	22	66	2	Response: 1, 3, 4
4/3/2019	82	20	82	22	Response: 1, 3, 4
4/3/2019	83	3	83	5	Response: 1, 3, 4
4/3/2019	85	10	85	14	Response: 1, 3, 4, 9
4/3/2019	85	17	85	19	Response: 1, 3, 4, 8, 9
4/3/2019	85	20	85	23	Response: 1, 3, 4, 9
4/3/2019	86	1	86	3	Response: 1, 3, 4, 8, 9
4/3/2019	95	14	95	16	Response: 1, 3, 4
4/3/2019	96	1	96	5	Response: 1, 3, 4
4/3/2019	96	9	96	12	Response: 1, 3, 4
4/3/2019	96	17	96	21	Response: 1, 3, 4
4/3/2019	96	25	96	25	Response: 1, 3, 4, 8
4/3/2019	98	22	99	1	Response: 1, 2, 3
4/3/2019	99	3	99	13	Response: 1, 2, 3, 8
4/3/2019	100	20	100	24	Response: 1, 2, 3
4/3/2019	101	1	101	1	Response: 1, 2, 3, 8
4/3/2019	102	8	102	12	Response: 1, 2, 3, 4
4/3/2019	102	19	102	19	Response: 1, 2, 3, 4, 8
4/3/2019	103	20	103	23	Response: 1, 3, 4
4/3/2019	104	2	104	5	Response: 1, 3, 4, 8
4/3/2019	104	10	104	10	Response: 1, 3, 4, 8
4/3/2019	104	19	104	21	Response: 1, 2, 3, 4
4/3/2019	105	3	105	4	Response: 1, 2, 3, 4, 8
4/3/2019	178	23	179	6	Response: 1, 2, 3, 4, 10
4/3/2019	179	13	180	1	Response: 1, 2, 3, 4, 8, 10
4/3/2019	180	5	180	7	Response: 1, 2, 3, 4, 8, 10
4/3/2019	213	1	213	4	Response: 1, 3, 7
4/3/2019	213	6	213	8	Response: 1, 3, 7, 8
4/3/2019	213	18	213	24	Response: 1, 3, 7, 8
4/3/2019	214	3	214	9	Response: 1, 3, 4, 7, 8
4/3/2019	214	12	214	13	Response: 1, 3, 4, 7, 8
4/3/2019	214	18	214	19	Response: 1, 3, 4, 7, 8
4/3/2019	223	7	223	15	Response: 1, 3, 4, 7, 8, 10
4/3/2019	223	21	223	23	Response: 1, 3, 4, 7, 10
4/3/2019	223	25	223	25	Response: 1, 3, 4, 7, 8, 10
4/3/2019	329	19	329	24	Response: 1, 3, 4

Defendants' Response Key for Keith Martin

- 1) **Relevance (General):** Testimony is relevant to DEA's and certain defendants' efforts to combat diversion of prescription opioid medications and comply with the CSA, which are central issues in this case. The Court expressly held that "the record is replete with disputes of material fact as to whether each Defendant complied with its obligations under the CSA, which preclude summary judgment." *See* Order and Opinion Regarding Plaintiffs' Summary Judgment Motions Addressing the Controlled Substances Act [Dkt. # 2483], at 20. The Court further held that DEA's interpretation of the law, assessment of whether certain actions by Defendants complied with the CSA, and enforcement activities (including whether DEA "impose[d] a no-shop requirement") presented "material facts in dispute that must be resolved by a jury." *See id.* at 28–29. Testimony regarding DEA's own investigatory and enforcement activities (or lack thereof) is also central to issues of proximate causation that must be decided by the jury.
- 2) **Relevance (CT1 Evidence):** Though certain plaintiffs and defendants have been severed from the CT1 trial for different reasons, evidence concerning those entities, including DEA's interactions with those entities and assessment of those entities' compliance with the CSA, is nonetheless relevant in assessing DEA's and other defendant's efforts to combat diversion of prescription opioid medications and comply with the CSA, which are central issues in this case. Such testimony is also central to issues of proximate causation as to remaining defendants, which must be decided by the jury.
- 3) **Foundation and Speculation:** Question asks for witness's personal understanding and recollection of DEA's and certain defendants' efforts to combat diversion of prescription opioid medications and comply with the CSA, which are central issues in this case. Witness testified extensively about his career with DEA and experience working in drug investigations, and was not asked to speculate regarding anyone else's knowledge or understanding besides his own.
- 4) **Scope (Authorization):** Testimony is covered by DOJ's authorization of witness's testimony regarding "Your general employment history with the DEA"; "Your general duties as Assistant Special Agent in Charge for DEA"; "Your personal recollection of your communications with any representative of Summit County, OH; Akron, OH; Cleveland, OH; and/or Cuyahoga County, OH regarding or relating to prescription opioids"; "Your personal knowledge of the DEA's general involvement with the Summit County, OH Drug Unit"; "Your personal recollection of your communications with any members of the Summit County, OH Drug Unit"; "Your personal knowledge of DEA's general efforts to combat diversion, respond to the Opioid epidemic, and/or form a joint task force to combat the Opioid epidemic in Summit County, OH; Akron, OH; Cleveland, OH; Cuyahoga County, OH; or any township, village, or city within Summit County or Cuyahoga County"; and "Your personal knowledge of DEA's general efforts to investigate any pharmacists, pharmacy interns, doctors or other prescribers in the City of Cleveland, the City of Akron, Cuyahoga County, or Summit County, or any township, village, or city within Summit County or Cuyahoga County, prior to registering them or renewing their registration to lawfully prescribe or dispense controlled substances."

- 5) **Scope (Touhy):** Scope objection does not apply. Touhy authorization is not required for questions relating to information learned outside of witness's employment with DEA.
- 6) **Duplicative/Cumulative:** Testimony is not duplicative or cumulative of other designations from Mr. Martin's testimony. Nor is Mr. Martin's testimony duplicative or cumulative of any other DEA witness. His specific career path—having been a Special Agent responsible for drug investigations in multiple cities through 2015, and then moving to Cleveland and assuming the role of Assistant Special Agent in Charge of DEA's Cleveland field office—gives him a different perspective on the central issues of this case than the other DEA fact witnesses. In addition, to the extent multiple DEA witnesses testified along similar lines on the issues central to this case, that is relevant to show that those witnesses shared a common understanding of DEA's interpretation and enforcement of the suspicious order monitoring regulation, rather than an outlier view, which is, in turn, relevant to defendants' scienter.
- 7) **Legal Conclusion:** Question does not call for legal conclusion, but rather Mr. Martin's personal understanding and/or knowledge of certain facts that are central to this case, including the source of certain drugs that have caused harm in Summit and Cuyahoga Counties.
- 8) **Answer:** Plaintiffs provide no basis to strike answer as non-responsive or for any other reason, and general objection to answer provided by Mr. Martin, based on his own personal understanding and in response to a valid question, is inappropriate.
- 9) **Argumentative:** Question is not argumentative. It does not ask or require the witness to agree to a conclusion unsupported by facts elicited during the deposition, and does not challenge, harass, or badger the witness in any way, as demonstrated by Mr. Martin's willingness to answer the question and the lack of any argumentative objection on the record.
- 10) **Hypothetical:** Question does not pose an incomplete hypothetical. Hypothetical includes all relevant parameters, does not instruct Mr. Martin to disregard other factors that may bear on his answer or otherwise restrict his ability to provide a response, and was not confusing as posed. To the extent Mr. Martin required any clarification, such clarification was subsequently provided.